

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA,

vs.

LONNELL NORVELL CHAMBLEE,

Defendant.

Case Number: 7:22-cr-506

**MOTION TO SEAL**

Now comes the Defendant, Lonnell Chamblee, by and through his undersigned counsel, and respectfully moves this Court to allow him to file his sentencing memorandum under seal.

The purpose of Defendant's request to seal is to protect his privacy interests and the interests of the Government as Defendant's sentencing memo discusses his personal medical history and discusses reports disclosed in discovery which are subject to this Court's Standing Order Governing Discovery (ECF No. 24).

Defendant respectfully submits that the need to protect Defendant's personal medical information and the information contained in discovery trumps the public's limited interest in access to this motion. The Court has inherent authority to seal this document. *See Baltimore Sun v. Goetz*, 886 F.2d 60 (4th Cir. 1988) and *In re Application of the United States for an Order Pursuant to 18 U.S.C Section 2703(D)*, 707 F.3d 283 (4th Cir. 2013).

Based on the important privacy interests at stake and the Court's authority to seal such documents, Defendant respectfully requests that the Court allow the filing of Defendant's sentencing memorandum under seal. The undersigned has consulted with the Government and the Government has no objection to Defendant's motion to seal.



Respectfully submitted,

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By: /s/ Sloan P. Ellis

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